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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91237315
Party	Plaintiff American Marriage Ministries
Correspondence Address	NANCY V STEPHENS FOSTER PEPPER PLLC 1111 3RD AVENUE SUITE 3000 SEATTLE, WA 98101 UNITED STATES Primary Email: nancy.stephens@foster.com 206-447-4400
Submission	Testimony For Plaintiff
Filer's Name	Nancy V. Stephens
Filer's email	stepn@foster.com
Signature	/Nancy V. Stephens/
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AMERICAN MARRIAGE MINISTRIES,)	Opposition No. 91237315
Opposer,)	Marks: GET ORDAINED
)	Application No. 87430729
v.)	
UNIVERSAL LIFE CHURCH)	
MONASTERY STOREHOUSE, INC.)	
Applicant.)	Filed: October 18, 2017

TESTIMONY FOR PLAINTIFF

Opposer American Marriage Ministries hereby submits the final transcript of the certified corrected transcript of the testimony deposition of Dallas Goschie taken September 9, 2020 with exhibits and errata sheet. The transcript was submitted and served on opposing counsel during Plaintiff's Testimony Period. It is being resubmitted formatted to conform to CFR §Sec. 2.123(g) pursuant to Applicant's request.

The testimony is relevant as evidence of evidence of services offered by Applicant, the relevant public's understanding of the term "get ordained," context for use of the term by parties other than the Applicant, mode and manner of use of "get ordained" by Applicant, dates of use of "get ordained" by Applicant, Applicant's intent when filing to protect "GET ORDAINED" as a trademark, knowledge of use of "get ordained" by parties other than Applicant. Such evidence is associated with the issue of exclusivity of use, no inherent distinctiveness or acquired distinctiveness, significance of term to the average purchaser of online ordination services, "get ordained" as a source identifier for relevant services, descriptive use of "get ordained," generic use of "get ordained," and damage to the Opposer which would result if a "term of art" or key phrase used by the industry is not available for use.

Dated: December 30, 2020

/Nancy V. Stephens/
Nancy V. Stephens WSBA No. 31510
Benjamin Hodges, WSBA No. 49301
Kelly A. Mennemeier, WSBA No. 51838
Foster Garvey PC
1111 Third Avenue, Suite 3000
Seattle, WA 98101-3299
206-447-4400
Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2020, I served the foregoing Testimony Transcript, Errata Sheet and Exhibits on the Applicant by emailing to Applicant as follows:

Michael P. Matesky, II Matesky Law PLLC <u>trademarks@mateskylaw.com</u> <u>mike@mateskylaw.com</u>

/Nancy V. Stephens/ Nancy V. Stephens

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2	BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
3	
4	
5	AMERICAN MARRIAGE MINISTRIES)
6)
7	Opposer,)
8	vs.) Opposition No.) 91237315
9	UNIVERSAL LIFE CHURCH MONASTERY) STOREHOUSE, INC.,
10	Applicant.)
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12	
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14	
15	REMOTE DEPOSITION OF DALLAS GOSCHIE
16	Seattle, Washington
17	Wednesday, September 9, 2020
18	
19	
20	
21	
22	
23	Reported by:
24	GWEN S. BRASS, CCR 1908
25	JOB NO. 183706

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1 DALLAS GOSCHIE,
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- called as a witness, having been
- 3 duly sworn remotely via video conference by
- 4 the certified stenographer, was examined and
- 5 testified as follows:

- 7 EXAMINATION
- 8 BY MS. MENNEMEIER:
- 9 Q. Would you please state your name.
- 10 A. Dallas Goschie.
- 11 Q. Mr. Goschie, do you understand that
- 12 you're under oath today?
- 13 A. I do.
- Q. Do you understand that that's the
- 15 same oath that you would take if you were
- 16 testifying in court?
- 17 A. I do.
- 18 Q. Are you familiar with the Universal
- 19 Life Church Monastery Storehouse?
- 20 A. I am.
- Q. What is your role with the
- 22 Universal Life Church Monastery Storehouse?
- 23 A. I am its operations manager, and I
- 24 am a director on its board.
- Q. How long have you been the

- 2 operations manager for the Universal Life
- 3 Church Monastery Storehouse?
- 4 A. Since June or July of 2014.
- 5 Q. How long have you been on the board
- 6 of directors for the Universal Life Church
- 7 Monastery Storehouse?
- 8 A. I'd have to look that up to give
- 9 you a specific date.
- 10 Q. Do you know what year you joined
- 11 the board?
- 12 A. I believe it was -- I could be
- 13 wrong, but I believe it was 2018.
- 14 Q. Is it true that the Universal Life
- 15 Church Monetary Storehouse's name does not
- 16 include an Inc.?
- 17 MR. MATESKY: Objection; leading.
- 18 Go ahead.
- 19 A. Could you ask that again.
- Q. Is it true that the University Life
- 21 Church Monastery Storehouse's name does not
- 22 include Inc. in the name?
- 23 A. That's correct.
- MR. MATESKY: Objection.
- O. Is it true that the Universal Life

- 2 Church Monastery Storehouse is not named the
- 3 Universal Life Church Monastery Storehouse
- 4 Inc., Incorporated?
- 5 MR. MATESKY: Objection; compound.
- 6 Objection; asked and answered.
- 7 Go ahead.
- 8 A. Sorry. That's correct.
- 9 Q. Is there an organization called
- 10 Universal Life Church Monastery Storehouse
- 11 Inc.?
- 12 A. Not that I'm aware of.
- Q. As far as you know, has an
- 14 organization called the Universal Life Church
- 15 Monastery Storehouse Inc. ever existed?
- 16 A. No.
- 17 Q. Can we agree that, if I use the
- 18 term ULCMS in my questions today, that I'm
- 19 referring to the Universal Life Church
- 20 Monastery Storehouse?
- 21 A. That's fine.
- Q. Is it true that ULCMS ordains
- 23 ministers?
- A. That's one of the things that we
- 25 do, yes.

- 2 Q. Does ULCMS sell goods to people who
- 3 have gotten ordained as ministers?
- 4 A. That's one of the things that we
- 5 do, yes.
- Q. ULCMS sells minister supplies,
- 7 right?
- 8 A. That's correct.
- 9 Q. Now, I'm going to open a copy of an
- 10 exhibit that's been pre-labeled Exhibit J. I
- 11 don't know whether you've received this yet,
- 12 so I can go ahead and share my screen.
- MR. MATESKY: So I have now
- 14 received an email with exhibits, so I
- can forward those to Mr. Goschie.
- MS. MENNEMEIER: Why don't we take
- 17 a quick -- maybe a two-minute break
- 18 while you send those.
- MR. MATESKY: Okay. That's fine
- with me.
- MS. MENNEMEIER: Great. We can, I
- think, go off the record for that.
- 23 (Recess taken from 9:16 a.m. to
- 24 9:20 a.m.)
- 25 ///

DALLAS GOSCHIE

2 BY MS. MENNEMETER:

- 3 Q. Could you please open a copy of the
- 4 document that's been pre-labeled Exhibit J.
- 5 (Exhibit J, Trademark/Service Mark
- 6 Application, Principal Register,
- 7 No. 87430729, 4/28/2017, was marked for
- 8 identification.)
- 9 Q. Please let me know when you have
- 10 that open.
- 11 A. Okay.
- 12 Q. Do you recognize this document?
- 13 A. I think I've seen it at one point.
- 14 Q. Is this document a copy of
- 15 Universal Life Church's trademark application
- 16 for the trademark "get ordained"?
- 17 A. That's what it looks like.
- 18 Q. Is this an accurate copy of ULCMS's
- 19 trademark application for "get ordained"?
- 20 MR. MATESKY: Objection;
- 21 foundation.
- 22 A. I'm not certain, but I have no
- 23 reason to believe that it isn't.
- Q. I'd like to direct your attention
- 25 first to -- let's see -- to the top of page 2

- 2 of this document where the second line, the
- 3 second and third line, where it says "first
- 4 use anywhere date" and "first use in customers
- 5 date."
- 6 Do you see those lines?
- 7 A. I do.
- 8 Q. And those lines are referring to
- 9 class 35 and say: At least as early as
- 10 November 17, 2016.
- MR. MATESKY: Objection; form.
- 12 Objection; leading.
- 13 Q. Did I read that right?
- 14 A. I believe so.
- 15 O. You were not aware of how ULCMS
- 16 picked those dates for this application, are
- 17 you?
- MR. MATESKY: Objection; leading.
- 19 A. Not off the top of my head, no.
- Q. Directing your attention down the
- 21 page to the middle of the page in class 45,
- 22 again, there are two lines that say "first use
- 23 anywhere date" and "first use in customers
- 24 date," and those two lines say: At least as
- 25 early as July 10, 2011.

- 1 DALLAS GOSCHIE
- Do you see those lines?
- MR. MATESKY: Objection; leading.
- 4 A. I do.
- 5 O. You were not aware of how ULCMS
- 6 picked those dates either, are you?
- 7 MR. MATESKY: Same objection.
- 8 A. Not off the top of my head, no.
- 9 THE WITNESS: And I don't know,
- 10 Mike, maybe you could get closer to the
- 11 mic. It's a little bit hard for me to
- 12 hear you.
- MR. MATESKY: Okay. I'll speak up.
- 14 THE WITNESS: Thanks.
- Q. Does ULCMS -- you can close this
- 16 exhibit now.
- Does ULCMS use "get ordained" as a
- 18 brand on all of its websites?
- 19 A. No, I don't believe so.
- Q. Does ULCMS use "get ordained" in
- 21 any manner other than as a brand on any of its
- 22 websites?
- 23 A. I need you to clarify what you mean
- 24 by "use 'get ordained.'"
- Q. Does the phrase "get ordained"

- 2 appear on any of ULCMS's websites in a manner
- 3 other than as a brand?
- A. Off the top of my head, I don't
- 5 know.
- 6 Q. When did you start using "get
- 7 ordained" as a brand?
- 8 A. It was already in use when I
- 9 started here.
- 10 I'm trying to remember. I know
- 11 that there's a date that was provided at some
- 12 point. I want to say it was in March of 2010.
- 13 I could be wrong about that. I'm referring to
- 14 a date that I think I specified in declaration
- 15 I made earlier in this matter.
- 16 Q. When did ULCMS start selling goods
- on its getordained.org website?
- 18 A. I'd have to look up that exact
- 19 date. I don't know off the top of my head.
- Q. Do you know what year ULCMS started
- 21 selling goods on the getordained.org website?
- MR. MATESKY: I'm going to object
- as vaque.
- A. I couldn't say with a hundred
- 25 percent certainty right now, no.

- O. Have customers -- when did
- 3 customers start being able to buy goods
- 4 directly from the getordained.org website?
- 5 A. I just don't remember that date at
- 6 this point.
- 7 Q. Do you remember the year?
- 8 A. No, not off the top of my head. I
- 9 could look that up.
- 10 Q. Where would you look to find that
- 11 information?
- 12 A. The emails.
- Q. Does ULCMS -- does the phrase ULCMS
- 14 or excuse me, strike that.
- Does the phrase "get ordained"
- 16 appear on the getordained.org site in a manner
- 17 other than as a brand?
- 18 A. Not that I'm aware of just off the
- 19 top of my head. But I don't memorize the
- 20 contents of every single page of every site
- 21 that we operate.
- Q. Is it your testimony that the
- 23 phrase "get ordained" might appear in a
- 24 context that is not as a brand on the
- 25 getordained.org website?

- 2 MR. MATESKY: Objection;
- 3 mischaracterizes prior testimony.
- 4 A. No. All I said is I don't know all
- 5 the ways that that phrase could appear
- 6 because, again, I haven't memorized the
- 7 content of every page of our websites.
- 8 Q. So is it possible that the phrase
- 9 "get ordained" appears not as a brand in some
- 10 manner on the getordained.org website?
- 11 A. I have no idea. Like we discussed
- 12 when we talked about this?? I don't remember if
- it was last year, maybe the year before??it's
- 14 very contextual. So --
- You wanted to point me to something
- 16 to look at.
- 17 Q. To clarify, you mean the use of the
- 18 phrase "get ordained" is very contextual?
- 19 A. The -- I'm trying of think of the
- 20 right or the correct word. Not the "use" of.
- 21 The maybe "intent" of. That's not quite the
- 22 right word either.
- Whether or not the term is being --
- 24 or the phrase is being used as a brand or as
- 25 something else I think is very contextual,

- 2 like we established earlier.
- 3 Q. ULCMS does not sell ordinations,
- 4 does it?
- 5 MR. MATESKY: Objection; leading.
- 6 A. No.
- 7 Q. ULCMS has never sold ordination
- 8 services, has it?
- 9 MR. MATESKY: Same objection.
- 10 A. Not to my knowledge.
- 11 Q. Individuals get ordained by ULCMS
- 12 for free, right?
- MR. MATESKY: Objection; leading.
- Objection; form.
- 15 A. Currently, yes.
- 16 Q. Historically, individuals
- 17 have gotten ordained by ULCMS for free, too,
- 18 right?
- MR. MATESKY: Objection; form.
- 20 Objection; vague.
- 21 A. That's my understanding.
- Q. Does ULCMS advertise its ordination
- 23 services?
- 24 A. Yes, I believe we do.
- Q. Does ULCMS have ads that describe

- 1 DALLAS GOSCHIE
- 2 how to get ordained as a minister?
- 3 MR. MATESKY: Objection; vague.
- 4 Objection; form.
- 5 A. We have ads -- I mean, you're very
- 6 limited in the text that can be available in
- 7 ads, and I don't know that -- I haven't
- 8 memorized the content of all of them, but I
- 9 imagine there are some that provide at least
- 10 some sort of service level explanation about
- 11 how one could become a minister, yes.
- 12 Q. Does ULCMS advertise the products
- 13 that it sells?
- 14 A. Yes.
- 15 Q. Do ULCMS's customers associate the
- 16 phrase "get ordained" with ULCMS specifically?
- 17 A. I don't know.
- Q. Do members of the public associate
- 19 the phrase "get ordained" with ULCMS?
- 20 A. For the same reason I don't know
- 21 the answer to the last question, no, I can't
- 22 hop into the head of every person.
- 23 You're making very universal
- 24 statements here as far as I'm hearing them.
- MR. MATESKY: I'll object to the

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- form of the question as vague as well.
- 3 Q. Do you know whether any of ULCMS's
- 4 customers associate the phrase "get ordained"
- 5 with ULCMS?
- 6 A. I've definitely heard things I
- 7 would imagine are that sort of use, yes.
- 8 Q. Where have you heard such use?
- 9 A. I would imagine it would be mainly
- 10 just walking through the support area of our
- offices over the years. When people are
- 12 taking phone calls, things like that.
- Q. You would imagine or you know?
- 14 A. I can't think of any other context
- off the top of my head when that may have
- 16 happened. I mean, someone could have come
- 17 over to my area and had a conversation like
- 18 that with me, I suppose. These interactions I
- 19 would say are so -- have probably been so
- 20 frequent and unremarkable that I don't
- 21 remember every single instance of that phrase
- 22 being used in that way.
- Q. Has the "get ordained" brand ever
- 24 received third party media recognition?
- 25 A. I'm not sure.

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- Q. Do you understand the phrase "get
- 3 ordained" to be associated with ULCMS?
- 4 A. That's how I used it.
- 5 Q. What has ULCMS done to make people
- 6 associate the phrase "get ordained" with
- 7 ULCMS?

- 8 A. Well, one of the things that we've
- 9 done is have a logo designed that features the
- 10 words "get ordained" very prominently and put
- 11 them on the top of every single subpage of the
- 12 website that we operate.
- 13 O. What else has ULCMS done?
- 14 A. I believe on that same website it's
- 15 been used within content in a brand context.
- 16 Q. Is the website that you're
- 17 describing the getordained.org website?
- 18 A. It's the website located at
- 19 getordained.org, that URL, yes.
- Q. Has ULCMS done anything else to
- 21 make people associate "get ordained" with
- 22 ULCMS?
- A. The only thing that comes to mind
- 24 is, again, just walking through that support
- 25 area of our facility, I might sometimes hear

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1 DALLAS GOSCHIE
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- 2 someone on the phone saying something like,
- 3 Which site are you on? Getordained?, " as a
- 4 question to someone they're speaking to on the
- 5 other end.
- 6 Q. At what point did the phrase "get
- 7 ordained" become associated with ULCMS?
- 8 A. I don't know.
- 9 MR. MATESKY: Objection;
- 10 foundation. Objection; vague as well.
- 11 Q. Has --
- MR. MATESKY: Let me -- sorry. I
- didn't mean to interrupt.
- 14 But let me know if you can hear me
- or if I'm still being too quiet, please.
- Or I guess let me know if you can't hear
- 17 me.
- MS. MENNEMEIER: I can hear you.
- 19 Gwen, are you able to hear?
- Fantastic.
- 21 Q. Has ULCMS received any customer
- 22 feedback regarding use of the phrase "get
- 23 ordained"?
- A. Not that I'm aware of off the top
- 25 of my head. I mean, nothing specific that I'm

DALLAS GOSCHIE

2 aware of.

- 3 Q. Has ULCMS engaged any third party
- 4 to look into how customers perceive the phrase
- 5 "get ordained"?
- 6 MR. MATESKY: I would object only
- 7 to the extent answering the question
- 8 would require disclosure of
- 9 attorney/client privilege material or
- 10 attorney work product.
- But you can go ahead and answer the
- 12 question if you don't think that would
- 13 be the case.
- A. Could you ask that just one more
- 15 time, please.
- MS. MENNEMEIER: Gwen, could you
- 17 please repeat my question.
- 18 (Record read by the stenographer:
- 19 Has ULCMS engaged any third party
- to look into how customers perceive the
- 21 phrase "get ordained"?)
- 22 A. Not that I can recall offhand.
- Q. You know it's possible to get
- 24 ordained through organizations besides ULCMS,
- 25 correct?

- 1 DALLAS GOSCHIE
- 2 MR. MATESKY: Objection; form.
- 3 Objection; vague. Objection; leading.
- A. Can you ask that one more time.
- 5 Q. You know that it's possible to get
- 6 ordained through organizations besides ULCMS,
- 7 right?
- 8 MR. MATESKY: Same objections.
- 9 A. It's kind of confusing. There are
- 10 other organizations through which one can
- 11 become a minister, if that's what you're
- 12 asking.
- Q. Do other organizations enable
- 14 people to become ordained?
- MR. MATESKY: Objection; asked and
- answered.
- 17 A. That's my understanding, yes.
- 18 Q. Is it true that you believe the
- 19 phrase "get ordained" can be used generically
- 20 to describe the legal process of becoming a
- 21 minister?
- MR. MATESKY: Objection. I'm
- sorry. I couldn't hear all of that
- 24 question. Could you maybe repeat it.
- MS. MENNEMEIER: Absolutely.

- Q. Is it true that you believe the
- 3 phrase "get ordained" can be used generically
- 4 to describe the legal process of becoming a
- 5 minister?
- 6 A. I'm not sure if I understand
- 7 ordination as a legal process. I guess it
- 8 does have legal implications, so you could
- 9 probably make that leap. Yes, I imagine in
- 10 some context that phrase could be used in that
- 11 way.
- 12 Q. Do you believe the phrase "get
- ordained" can be used generically to describe
- 14 the religious process of becoming a minister?
- MR. MATESKY: Objection; form.
- Objection; vague regarding use of the
- 17 words "generic" and "describe." Calls
- 18 for a legal conclusion.
- 19 A. I think in certain context that
- 20 could be possible.
- Q. You do not think the phrase "get
- 22 ordained" only refers to services provided by
- 23 ULCMS, do you?
- MR. MATESKY: Objection; leading.
- Objection; vague and confusing.

- 2 A. No. I think it's all contextual.
- 3 Q. You agree that the phrase "get
- 4 ordained" can be used to refer to the act of
- 5 becoming a minister through an organization
- 6 besides ULCMS, right?
- 7 MR. MATESKY: Objection; leading.
- 8 Objection; form.
- 9 A. Can I hear that one one more time,
- 10 please.
- 11 Q. Of course.
- 12 You agree that the phrase "get
- 13 ordained" can be used to refer to the act of
- 14 becoming a minister through an organization
- 15 besides ULCMS, right?
- MR. MATESKY: Same objections.
- 17 A. Again, I suppose theoretically it's
- 18 possible in some context. If you wanted me to
- 19 look at something, I'm happy to do that.
- Q. You personally have heard people
- 21 use the phrase "get ordained" in connection
- 22 with the process of becoming a minister since
- 23 you were a child, right?
- MR. MATESKY: Objection; assumes
- facts not in evidence. Objection;

DALLAS GOSCHIE

leading.

- 3 A. I'm not certain that I would say
- 4 that. I guess I don't know what age you're
- 5 defining childhood as.
- Q. You became aware that people used
- 7 the phrase "get ordained" in connection with
- 8 the process of becoming a minister when you
- 9 were in catechism class; is that right?
- MR. MATESKY: Objection; assumes
- 11 facts not in evidence. Objection;
- 12 leading.
- 13 A. I believe that's when I learned of
- 14 the term "ordination" because the
- 15 pastor/instructor of that class I think had
- 16 some previous history studying ancient
- 17 languages, so he always liked to pull out
- 18 words like that and talk to us about, like,
- 19 their Greek origins. So I think I maybe heard
- 20 the word "ordination" in that context.
- I have trouble picturing that
- 22 individual using the word "get." It seems a
- 23 little bit too casual for him.
- Q. You were approximately 9 or 10
- 25 years old when you took those catechism

DALLAS GOSCHIE

2 classes, correct?

- 3 MR. MATESKY: Objection; assumes
- 4 facts not in evidence. Objection;
- 5 leading.
- A. No. I think I would have started
- 7 those -- 11 or 12.
- 8 Q. Do you know whether organizations
- 9 besides ULCMS used the phrase "get ordained"?
- 10 A. I don't know. I don't memorize --
- 11 like, I don't memorize the content of
- 12 everything that we publish or have published,
- 13 I don't memorize everything that every other
- 14 organization has published.
- 15 Q. Do you know whether any other
- organization uses the phrase "get ordained"?
- 17 A. Nothing specific that I can recall
- 18 off the top of my head, no.
- 19 Q. Do you know whether any other
- 20 organization that ordains people uses the
- 21 phrase "get ordained"?
- MR. MATESKY: Objection; asked and
- answered.
- A. Again, no specific example of that
- 25 is coming to me right now.

- 2 Q. ULCMS ordains people through more
- 3 than one website, is that right?
- 4 MR. MATESKY: Objection; leading.
- 5 A. That's correct.
- Q. If I can have you open the document
- 7 that's been pre-labeled Exhibit A.
- Please let me know when you have
- 9 that open.
- 10 (Exhibit A, Printout of a ULCMS
- 11 website, was marked for identification
- MR. MATESKY: Before you ask a
- question, I'm just going to step away
- for about 15 seconds. Give me one
- 15 second.
- Okay. I'm back.
- 17 Q. Do you have the document open,
- 18 Mr. Goschie?
- 19 A. I do, yes.
- 20 Q. Great.
- 21 Can you tell me what this document
- 22 shows?
- MR. MATESKY: Objection;
- 24 foundation.
- 25 A. It looks like it shows some visual

- 2 and written elements that appear on one of our
- 3 websites. I've never seen it in this format
- 4 before.
- O. Sure.
- 6 And I'll represent to you that this
- 7 is what a printout of one of ULCMS's websites
- 8 look like.
- 9 Can you tell me specifically which
- 10 website this content appears on?
- 11 A. I believe this is from
- 12 themonastery.org.
- Q. Is themonastery.org --
- A. Dot org I should say.
- 15 Q. I'm sorry. I spoke over you.
- 16 Could you repeat that last bit.
- 17 A. Yeah.
- I should stay it's from the website
- 19 located at monastery.org. Just to make that
- 20 clear.
- 21 Q. Is the website located at
- themonastery.org a website that ULCMS
- 23 operates?
- 24 A. It is.
- 25 Q. Is this document -- does this

- 2 document contain an accurate representation of
- 3 the content of the website located at
- 4 themonastery.org?
- 5 A. I wouldn't say so.
- 6 O. Does this document contain an
- 7 accurate representation of the content
- 8 available at the web page themonastery.org?
- 9 A. I would not say so, no.
- 10 Q. What aspects of that website do you
- 11 believe are not accurately represented here?
- 12 A. Well, just right off the bat, it
- 13 looks as though you're missing the entire top
- 14 25 or 30 percent of the website, which
- includes a large header and a row of tabs.
- 16 And there may be a few other things that
- 17 aren't represented here. I'd have to look at
- 18 them side by side, I suppose.
- 19 MR. MATESKY: I'll object to use of
- this document on lack of completeness
- 21 grounds.
- Q. Does ULCMS ordain people through
- 23 themonastery -- through the website located at
- themonastery.org?
- 25 A. Yes.

- 2 Q. If I could have you open the
- 3 documents that's been pre-labeled Exhibit B.
- 4 (Exhibit B, Visual and written
- 5 information from getordained.org, was
- 6 marked for identification.)
- 7 A. Sorry. Exhibit what?
- 8 O. B.
- 9 Please let me know when you have
- 10 that document open.
- 11 A. It's open.
- 12 O. What does this document show?
- MR. MATESKY: Objection; lack of
- 14 foundation.
- 15 A. It looks like it might include some
- 16 of the visual and written information that's
- 17 available somewhere on the website at
- 18 getordained.org.
- 19 Q. Does ULCMS operate the website
- 20 located at getordained.org?
- 21 A. It does.
- Q. Does ULCMS ordain people through
- 23 that website?
- 24 A. It does.
- Q. I'd like it if you'd open the

1	DALLAS GOSCHIE	Page 29
2	document that's been pre-labeled Exhibit C.	
3	MR. MATESKY: So I'm going to	
4	object to use of Exhibit B on lack of	
5	completeness grounds.	
6	(Exhibit C, Screenshot of ULC.org,	
7	was marked for identification.)	
8	MS. MENNEMEIER: Mike, could you	
9	explain your lack of completeness	
10	objection a bit further.	
11	MR. MATESKY: Yeah.	
12	MS. MENNEMEIER: What contents do	
13	you believe are missing?	
14	MR. MATESKY: I don't believe it's	
15	a complete representation of any I	
16	don't I don't believe Exhibit B	
17	includes all the content available on	
18	any web page.	
19	MS. MENNEMEIER: Sure. A and B are	
20	both printouts of web pages. They	
21	contain all of the information that's	
22	available when you go to print those web	
23	pages, but I understand your objection.	
24	By MS. MENNEMEIER:	
25	Q. Do you have Exhibit C open,	

DALLAS GOSCHIE

2 Mr. Goschie?

- 3 A. I do.
- 4 Q. Do you recognize what's shown in
- 5 Exhibit C?
- 6 MR. MATESKY: Before you answer,
- 7 I'm going to object to use of this
- 8 document on lack of authentication and
- 9 lack of completeness grounds and also to
- the extent this has not been previously
- 11 produced in the litigation.
- 12 Sorry. If you want to repeat the
- 13 question. I don't remember what it was.
- 14 Maybe Mr. Goschie does.
- 15 Q. Do you recognize this document,
- 16 Mr. Goschie?
- 17 A. I have never seen what I'm looking
- 18 at before, no.
- 19 Q. Do you know what is shown in this
- 20 document?
- 21 A. I could guess, based on contextual
- 22 clues, that this is a series of screen grabs
- 23 that I'm imagining you took because there's a
- 24 little K in the corner of a page of the
- 25 website at ULC.org, and you took them it looks

- 2 like??I don't know what today is??last night
- 3 or two days ago, from 4:59 p.m. to 5:01 p.m.
- 4 Q. Is the ULC.org website a website --
- 5 excuse me.
- In the website located at ULC.org a
- 7 website that ULCMS operates?
- 8 A. It is.
- 9 Q. Does ULCMS ordain people through
- 10 that website?
- 11 A. That is one of many things that it
- 12 does through this website, yeah.
- Q. Do these screen captures appear to
- 14 accurately reflect the content available at
- 15 the web page ULC.org?
- 16 A. I have not memorized every word of
- 17 that web page. Just skimming through this
- 18 right now, I don't have any reason to believe
- 19 that it isn't accurate.
- Q. If I can have you open the document
- 21 that's been pre-labeled Exhibit D.
- 22 (Exhibit D, Screenshot from
- themonastery.org, archived by the
- Wayback Machine, November 9, 2006, AMM
- 25 00702, was marked for identification.)

- 2 MR. MATESKY: Before we get to that
- 3 one, just to make sure -- I know the
- 4 objection's on the record. I may have
- 5 already done this. I'm not trying to be
- 6 duplicative, but we object to use of
- 7 Exhibit C on lack of authentication
- 8 grounds and on the grounds that it was
- 9 not previously produced in discovery or
- 10 otherwise in the litigation and to
- 11 Exhibits A and B on grounds that they
- were not previously produced in the
- 13 litigation as well, in addition to the
- 14 previously noted objections.
- 15 Q. Is Exhibit D open?
- 16 A. I do.
- 17 Q. Do you recognize this document?
- 18 MR. MATESKY: Before you answer,
- 19 I'd also like to object to use of this
- 20 document on lack of authentication
- 21 grounds and because it was not -- to the
- 22 extent it was not previously produced in
- 23 discovery. I see a Bates number on it,
- 24 but if this was not previously produced,
- 25 then we object on that grounds as well.

- Object to the question on lack of
- 3 foundation grounds.
- Q. Mr. Goschie, is it true that you
- 5 have seen this document before?
- A. If I have seen it, I don't recall
- 7 it.
- 8 Q. Is it your testimony today that you
- 9 do not recall having ever seen this document?
- 10 A. I don't remember.
- MR. MATESKY: Objection; asked and
- 12 answered.
- 13 Q. Mr. Goschie, you gave prior
- 14 testimony in this case, right?
- MR. MATESKY: Objection; leading.
- 16 A. I sat for a deposition with you.
- 17 Again, I can't remember if it was last year or
- 18 the year before.
- 19 Q. That deposition took place on
- January 18, 2019; is that right?
- MR. MATESKY: Objection; leading.
- A. If that's what you say. You
- 23 probably know better than I do.
- Q. There was a court reporter at that
- 25 deposition. Do you remember that?

1 DALLAS	GOSCH	ΙE
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- 2 MR. MATESKY: Objection; leading.
- 3 A. I mean, I'm sure there was, but I
- 4 don't remember her being there or him being
- 5 there.
- 6 O. You were under oath for that
- 7 deposition, right?
- 8 MR. MATESKY: Objection; leading.
- 9 A. I would imagine so.
- 10 Q. That deposition, you were presented
- 11 with a copy of this document, right?
- MR. MATESKY: Objection; leading.
- Objection; asked and answered.
- 14 A. Again, if I was, I just don't
- 15 recall ever looking at this. It's possible.
- 16 O. The document labeled Exhibit D in
- 17 the corner has a little number titled
- 18 AMM 00702.
- 19 Do you see that?
- 20 A. I do.
- Q. I'm going to share my screen now.
- 22 This is a page from your prior deposition.
- 23 MR. MATESKY: Is this document
- 24 being introduced into evidence?
- 25 MS. MENNEMEIER: Yes. And we can

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- Q. Turning back to Exhibit D, this
- 3 document, does this document show an archived
- 4 version of the website available at
- 5 themonastery.org?
- 6 MR. MATESKY: Objection; lack of
- 7 foundation.
- 8 A. From what I can tell, it looks to
- 9 be, like, a screen capture of the
- 10 site located -- or the page, I should say,
- 11 located at themonastery.org taken by the
- 12 Wayback Machine on November 9, 2006.
- Q. Are you familiar with the Wayback
- 14 Machine?
- 15 A. Generally, yes.
- Q. What is the Wayback Machine?
- 17 A. I believe it's a project that
- 18 regularly crawls and catalogs certain pages on
- 19 certain sites at random-ish intervals. I'm
- 20 actually not sure how often they capture them
- 21 or what their protocol is there.
- Q. The page shown in Exhibit D, is
- 23 that an archived copy of themonastery.org web
- page as it appeared on November 9, 2006?
- MR. MATESKY: Objection; asked and

- 1 DALLAS GOSCHIE
- 2 answered. Objection; lack of
- 3 foundation.
- 4 A. That's what it looks like. I don't
- 5 believe that I had visited this website myself
- 6 in 2006, so I suppose I couldn't say for
- 7 certain.
- 8 Q. But that's what the Wayback Machine
- 9 reflects this website as looking like on that
- 10 day; is that right?
- MR. MATESKY: Objection; leading.
- 12 Objection; lack of foundation.
- 13 A. I have no reason to believe it's
- 14 not, apart from -- I'm guessing that that
- 15 highlighted phrase "get ordained" is an
- 16 emphasis that you added in later. I'm not
- 17 sure if anything else was added in later.
- 18 Q. If I can have you open the document
- 19 that's been pre-labeled Exhibit E.
- 20 (Exhibit E, Screenshot from
- 21 getordained.org, archived by the Wayback
- 22 Machine, March 24, 2010, ULCM000245, was
- 23 marked for identification
- 24 A. E as in elephant?
- Q. E as in elephant.

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- 2 MR. MATESKY: And just a second. I
- don't have that open yet. Give me just
- 4 a moment.
- 5 Okay.
- 6 A. I have it open.
- 7 Q. Do you recognize this document?
- 8 A. If I've seen it before, I don't
- 9 remember seeing it.
- 10 Q. Can you tell whether ULCMS produced
- 11 this document in discovery?
- 12 A. I believe, because that Bates
- 13 number begins with -- or Bates code begins
- 14 with ULCM, that that means this is something
- 15 that we produced; but I'm not an attorney, so
- 16 I could be getting that wrong.
- 17 Q. For the record, could you identify
- 18 where you're finding the Bates code that
- 19 begins ULCM on the document.
- 20 A. Yes. It's in the bottom right
- 21 corner.
- Q. Does this document show an archived
- 23 version of a web page?
- MR. MATESKY: Objection; lack of
- 25 foundation.

- 2 A. It appears to show a screen grab or
- 3 capture archived by the Wayback Machine from
- 4 March 24, 2010.
- 5 Q. What web page is this a screen
- 6 capture of? Excuse me.
- 7 What web page is this an archived
- 8 version of?
- 9 MR. MATESKY: Objection;
- 10 mischaracterizes prior testimony and
- 11 leading.
- 12 A. I believe this is a screen capture
- of the site at that date, of the site located
- 14 at getordained.org. Or the page located at
- 15 getordained.org, to be more specific.
- Q. And you may have said this earlier,
- 17 but I think I missed it.
- 18 What date was this archived version
- 19 captured?
- MR. MATESKY: Objection; lack of
- foundation, and I believe asked and
- answered.
- But go ahead.
- A. Yes, I did, and it looks like
- 25 March 24, 2010.

DALLAS GOSCHIE

- Q. If I can have you open the document
- 3 that's been pre-labeled Exhibit F.
- 4 (Exhibit F, Screenshot of a page
- from getordained.org, archived by the
- 6 Wayback Machine, July 10, 2011,
- 7 ULCM000246, was marked for
- 8 identification.)
- 9 Q. Please let me know when you have
- 10 that open.

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- 11 A. All right.
- 12 Q. Do you recognize this document?
- 13 A. If I've seen it before, I don't
- 14 recall seeing it.
- Q. Can you tell whether ULCMS produced
- 16 this document in discovery?
- 17 A. Again, I'm half guessing here, but
- 18 I believe that, based on the Bates code in the
- 19 bottom right-hand corner of this document,
- 20 that it was something that was provided by
- 21 ULCMS.
- Q. What does this document show?
- 23 A. It appears to be an archived screen
- 24 capture of the web page located at
- 25 getordained.org cataloged by the Wayback

- 2 Machine on 10th of July 2011.
- 3 MR. MATESKY: And I'm just
- 4 going to -- I didn't get this objection
- 5 in earlier but just on lack of
- 6 foundation.
- 7 Q. If I can have you open the document
- 8 that's been pre-labeled Exhibit G.
- 9 (Exhibit G, Screenshot of a web
- page from getordained.org/how to perform
- 11 weddings, archived by the Wayback
- 12 Machine, July 23, 2011, ULCM000248, was
- marked for identification.)
- 14 A. All right.
- 15 Q. Do you recognize this document?
- 16 A. If I have seen them before, I don't
- 17 recall having seen it.
- Q. Can you tell whether ULCMS produced
- 19 this document in discovery?
- A. Again, half guessing here, but
- 21 based on the Bates code located in the bottom
- 22 right of the document, I imagine that it was
- 23 something that was produced by ULCMS.
- Q. What does this document show?
- MR. MATESKY: Object; lack of

- 2 foundation.
- 3 A. It appears to show an archived
- 4 capture of the web page located at
- 5 getordained.org/how to perform weddings. It
- 6 looks as though it's cataloged by the Wayback
- 7 Machine on the 23rd of July, 2011.
- Q. If I could have you open the
- 9 document that's been pre-labeled Exhibit H.
- 10 (Exhibit H, Screenshot of a web
- page from getordained.org, archived by
- the Wayback Machine, December 27, 2014,
- 13 ULCM000197, was marked for
- identification.)
- 15 A. Okay.
- Q. Do you recognize this document?
- 17 A. If I've seen it before, I don't
- 18 recall having seen it.
- 19 Q. Can you tell whether ULCMS produced
- 20 this document in discovery?
- 21 A. Again, half guessing, but I
- 22 believe, based on the Bates code located in
- 23 the bottom right of the document, it was
- 24 provided by ULCMS.
- O. What does this document show?

1	DALLAS	GOSCHIE

- 2 MR. MATESKY: Objection; lack of
- 3 foundation.
- 4 A. I will say that on my screen it
- 5 appears rather pixilated, so I don't know if I
- 6 can make out every word, but it looks like
- 7 some sort of capture taken -- I imagine by the
- 8 Wayback Machine, but that's not immediately
- 9 present on here. But other visual elements
- 10 look similar to captures cataloged by Wayback
- 11 Machine, and it looks as though this was a
- 12 screen capture of -- I can't quite make out
- 13 that URL, but I believe it's just for the page
- 14 located at getordained.org, and it looks as
- 15 though it was captured on the 27th of
- 16 December, 2014.
- 17 Q. If I could have you open the
- 18 document that's been pre-labeled Exhibit I.
- 19 (Exhibit I, Screenshot of a page
- from getordained.org, archived by the
- 21 Wayback Machine, July 16, 2016,
- 22 ULCM000200, was marked for
- 23 identification.)
- 24 A. All right.
- Q. Do you recognize this document?

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- 2 A. If I've seen it before, I don't
- 3 recall having seen it.
- Q. Can you tell whether ULCMS produced
- 5 this document in discovery?
- A. Again, I'm half guessing here, but,
- 7 based on the Bates code located at the bottom
- 8 right corner, I imagine that it was something
- 9 produced by ULCMS.
- 10 Q. What does this document show?
- 11 MR. MATESKY: Objection; lack of
- 12 foundation.
- 13 A. It appears to be a screen capture
- of the web page located at getordained.org.
- 15 I'm not sure if it was from the Wayback
- 16 Machine because that information isn't
- immediately apparent within this document.
- 18 Based on other visual elements that I can see
- 19 that are similar to captures that I've seen
- 20 from the Wayback Machine, I would imagine that
- 21 it's from the Wayback Machine, and it looks as
- 22 though this particular capture was taken on
- 23 the 16th of July, 2016.
- Q. Okay. You can close that document.
- Does ULCMS ordain people under the

- 1 DALLAS GOSCHIE
- 2 "get ordained" logo on the ULC.org website?
- MR. MATESKY: I'm sorry. Can you
- 4 ask that question again. I didn't
- follow it.
- Q. Does ULCMS ordain people under the
- 7 "get ordained" logo on the ULC.org website?
- MR. MATESKY: Objection; vague,
- 9 ambiguous.
- 10 Q. And let me rephrase that.
- Does ULCMS ordain people under the
- 12 "get ordained" logo on the website located at
- 13 ULC.org?
- MR. MATESKY: Same objections.
- 15 A. You mean physically located
- 16 underneath that logo?
- Q. Does the "get ordained" logo appear
- 18 on the ULC -- on the website located at
- 19 ULC.org?
- 20 A. Not that I'm aware of.
- Q. Does the "get ordained" logo appear
- on the website located at themonastery.org?
- A. It may, but I can't think of any
- 24 specific instance of that right now.
- MS. MENNEMEIER: This last bit is

1 DALLAS GOSCHIE going to get into some question or some topics that I know that ULCMS has previously 3 designated as being AEO. Given that, I think it may be appropriate to ask Lewis King to 5 6 leave so we can complete those questions. 7 And I'm not sure whether you plan to continue to designate this information AEO, 8 and I don't know how this -- going to treat it 9 but --10 MR. MATESKY: Well, let's --11 let's -- I mean, probably the way to go 12 13 is to have Lewis get off of the 14 deposition and, you know, we'll -- after 15 the transcript's available, we can 16 designate what we designate. But for 17 now, that's probably the way to go. 18 MS. MENNEMEIER: Okay. 19 THE WITNESS: And would this 20 perhaps also be a good time to just have like a two-minute break? 21 22 MS. MENNEMEIER: Absolutely. Why 23 don't we take 10 minutes. It's 10:15 24 right now, and we can come back at

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10:20.

1 DALLAS GOSCHIE Works for me. MR. MATESKY: (Recess taken from 10:15 a.m. to 3 10:24 a.m.) 4 MR. MATESKY: And I would just like 5 6 to note for the record that we do object 7 to introduction of Exhibits D through I on lack of authentication grounds. 8 So I don't know if that means you 9 want to ask any further questions about 10 those, but we, of course, can do that if 11 12 you want to. 13 MS. MENNEMEIER: My understanding 14 is that those exhibits are 15 self-authenticated based on the content 16 of them, so I don't believe that's 17 necessary. MR. MATESKY: And, also, to the 18 extent they are being introduced or will 19 be introduced to prove the truth of any 20 content or assertions therein, also on 21 22 hearsay grounds. 23 Okay. I got that out of the way. 24 BY MS. MENNEMEIER:

And for the record, I want to note

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- that we have asked Lewis King, AMM's corporate
- 3 representative, to leave, and he has done so
- 4 out of respect for the fact that we -- that I
- 5 expect that we will cover some information
- 6 that I know that ULCMS has previously
- 7 designated attorneys' eyes only, and I would
- 8 just like to add that we would ask and expect
- 9 that if information regarded by AMM to be AEO
- 10 for AMM is presented, that we would, you know,
- 11 expect that ULCMS would do the same courtesy
- 12 of having its corporate representatives step
- 13 aside for introduction of evidence. That
- 14 might be --

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- MR. MATESKY: Yeah, we agree with
- that process. If there's a, you know,
- 17 reasonable likelihood that material
- covered is going to be designated as AEO
- by a party, then we're okay with having
- the opposing party step out of the
- 21 testimony deposition.
- MS. MENNEMEIER: Fantastic. Okay.
- 23 BY MS. MENNEMEIER:
- Q. Mr. Goschie, how many ministers has
- 25 ULCMS ordained under the "get ordained" brand?

DALLAS GOSCHIE

2 A. Idon't know.

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- Q. Is it true that between January 1,
- 4 2014, and October 30, 2019, ULCMS ordained
- 5 344,597 people in the United States via the
- 6 getordained.org website?
- 7 A. I don't have the number memorized.
- 8 That sounds like it was the number that was
- 9 discussed previously, yes.
- 10 Q. Is there a document that would be
- 11 able to refresh your recollection as to an
- 12 exact number?
- 13 A. I know I looked at one yesterday.
- 14 I believe it was a declaration that I gave
- 15 last year, last summer.
- 16 Q. If I were to show you a copy of
- 17 that declaration, would that refresh your
- 18 recollection?
- 19 A. It might.
- Q. Then I am going to share my screen
- 21 and show you a copy of that declaration and
- 22 this is -- can you see my screen?
- 23 A. I can.
- Q. Okay. This is a declaration given
- 25 by you on October 30, 2019; is that right?

- 1
- 2 A. Yes.
- Q. And I can pull the screen, but
- 4 please let me know if you would like me to
- 5 scroll to any particular place so that you can
- 6 refresh your recollection as to the exact
- 7 number of individuals who have become ordained
- 8 between 2014 and October 30, 2019, through the
- 9 getordained.org website.
- 10 A. Well, it looks like you are already
- 11 there, and I believe that's the number that
- 12 you just said, so I think we're all good.
- Q. Okay. So just so that I can get a
- 14 clear answer, is it true that between
- 15 January 1, 2014, and October 30, 2019, ULCMS
- ordained 344,597 people in the United States
- 17 via the getordained.org website?
- 18 MR. MATESKY: Leading. Objection.
- 19 Assumes facts not in evidence.
- A. That's my understanding, yes.
- Q. Has the ULCMS brand always appeared
- 22 on the getordained.org website?
- MR. MATESKY: Objection; vague.
- Objection -- objection; vague and
- confusing with regard to ULCMS brand.

- 2 A. Could you ask that one more time.
- 3 O. Does ULCMS have a brand?
- 4 A. I would say we have a number of
- 5 brands.
- 6 Q. Let me ask that again.
- 7 Is ULCMS a brand for ULCMS?
- 8 MR. MATESKY: Objection; vague,
- 9 confusing to the extent you're using
- sort of a term that was defined early on
- in the deposition.
- 12 A. I'm not a marketing expert. The
- 13 way that I understand the word "brand," maybe.
- 14 I don't know.
- Q. What brands does ULCMS have or use?
- 16 A. I would say "get ordained" is one.
- 17 I would say the "Universal Live Church
- 18 Monastery" is one. "Universal Life Church
- 19 ministries" is another one.
- Q. Any others?
- A. There may be. I'd have to think
- 22 about that a little bit more.
- O. Does ULCMS use "Universal Life
- 24 Church" as a brand?
- A. I'm not sure about that one. I'd

- 2 have to look into that.
- 3 Q. Does ULCMS use one of its brands
- 4 that contains the words "Universal Life
- 5 Church" on the website located at
- 6 getordained.org?
- 7 A. I believe, and I could be
- 8 incorrect, that the copyright ownership info
- 9 located in the footer of the pages of that
- 10 website would include our legally registered
- 11 "dba Universal Life Church ministries," which
- 12 is also a brand that we use.
- Q. Does that brand appear on every web
- 14 page on the website located at
- 15 getordained.org?
- 16 A. To my understanding.
- 17 Q. Has that brand always appeared on
- 18 the web pages at the -- on the website located
- 19 at getordained.org?
- 20 A. I don't believe so.
- Q. How long has that brand appeared on
- the web pages located at getordained.org?
- 23 A. I'm not certain for sure.
- 24 And I want to clarify that in
- 25 addition to its use in the footer, that brand

- 2 name would also appear in a number of
- 3 different products and minister supplies that
- 4 are available in that catalog section of the
- 5 site located at getordained.org. So...
- Q. To clarify, which brands appears
- 7 on...
- 8 A. "Universal Life Church ministries."
- 9 Q. If I can have you open a document
- 10 we already looked at, the one pre-labeled
- 11 Exhibit J, and if I could have you scroll
- 12 just -- why don't we say scroll to the last
- 13 page.
- 14 A. Sorry. I closed that. I'm opening
- 15 it up again.
- You said the second to last page?
- 17 Q. The last page.
- 18 A. Last page. Okay.
- 19 Q. Can you tell me what the last page
- 20 shows.
- 21 A. I see what appears to be a screen
- 22 capture of the web page located at
- 23 getordained.org/become a minister.
- Q. Looking in the logo in the top --
- well, and, actually, before I ask that, can

- 1 DALLAS GOSCHIE
- 2 you tell when the screen capture of this web
- 3 page was taken?
- A. No, not really.
- 5 Q. Do you see the indication in the
- 6 bottom left-hand -- or the bottom right-hand
- 7 corner that says Thursday, April 27, 2017?
- 8 A. I do.
- 9 Q. Do you think that might reflect
- 10 when this screen capture was taken?
- 11 A. I don't know. That almost looks
- 12 like those little boxes that pop up in some
- 13 browsers when you hover over elements, but I
- 14 have no reason to think that isn't the date, I
- 15 guess, of this capture. I have no idea what
- 16 that is. I don't think that's on the web
- 17 page.
- 18 Q. Now, if I could direct your
- 19 attention to the top left-hand corner where it
- 20 says -- where the "get ordained" logo appears.
- 21 Do you see that?
- 22 A. I do.
- Q. And do you see where it says "Get
- 24 Ordained Universal Life Church" in that logo?
- 25 A. I do.

- O. Have the words "Universal Life
- 3 Church" -- how long have the words "Universal
- 4 Life Church" appeared in the logo?
- 5 MR. MATESKY: Objection; compound.
- 6 A. I don't know. I don't even know if
- 7 they still appear there.
- 8 Q. Pardon?
- 9 A. I don't even know if they still
- 10 appear there, so I'm not sure if I understand
- 11 the question.
- 12 O. Sure.
- 13 Then why don't -- okay. Let's do
- 14 this. I'm going to share my screen, and I'm
- 15 going to pull up the getordained.org website
- 16 as it appears today. So that we can look into
- 17 that. Okay?
- Okay. Do you see my screen?
- 19 A. Yes.
- MR. MATESKY: I'll just object to
- the extent counsel's representations are
- 22 not testimony. And object to the extent
- this is not a document being introduced
- into evidence.
- Q. Looking at this patent claim, can

- 2 you see whether "Universal Life Church"
- 3 appears in the logo for "get ordained"?
- 4 A. I see some words there. I don't
- 5 know if it's just my eyesight, but I can't
- 6 quite make out what they say.
- 7 Q. Does that help?
- 8 A. It does.
- 9 Q. Do you see the words "Universal
- 10 Life Church" in the "get ordained" logo?
- 11 A. I do.
- 12 O. Is it true that Universal Life
- 13 Church appears in the "get ordained" logo as
- 14 it is used today?
- MR. MATESKY: Objection; lack of
- foundation. Sorry. Objection; lack of
- 17 foundation.
- 18 Go ahead.
- 19 A. Assuming that this is an accurate
- 20 copy of this website as it appears today, yes.
- Q. And then scrolling down to the
- 22 bottom, looking at the green bar along the
- 23 bottom, do you see that green bar?
- 24 A. I see two green bars.
- Q. The lighter green bottom, green

- 1 DALLAS GOSCHIE
- 2 ribbon across the bottom, do you see that?
- 3 A. I do.
- Q. Do you see where it says "Get
- 5 Ordained/Universal Life Church"?
- 6 A. I do.
- 7 Q. Does ULCMS have a dba of Universal
- 8 Life Church?
- 9 MR. MATESKY: Objection; vague.
- 10 A. As far as I'm aware, only legally
- 11 registered dba is "Universal Life Church
- 12 ministries."
- 13 Q. Okay. And then looking at the
- 14 screen that I'm sharing, do you have any
- 15 reason to believe that this is not accurate --
- is not an accurate representation of what the
- 17 getordained.org website looks like today?
- MR. MATESKY: Objection; form.
- 19 A. Nothing in particular standing out.
- Q. Okay. Does every web page on which
- 21 ULCMS uses the "get ordained" brand on the
- 22 getordained.org website also include the words
- 23 "Universal Life Church"?
- MR. MATESKY: I'm going to object
- as vague and confusing.

DALLAS GOSCHIE 1 Also, can we just take a break for, you know, 30 seconds? 3 MS. MENNEMEIER: Sure. Can we 4 answer the question first? We have a 5 6 question pending, and I'd prefer to get 7 an answer. Gwen, could you read the question. 8 9 (Record read by the stenographer: "Does every web page on which ULCMS 10 uses the "get ordained" brand on the 11 getordained.org website also include the 12 words 'Universal Life Church'"?) 13 14 Α. I don't know. 15 MR. MATESKY: Okay. Could we pause for a sec? 16 MS. MENNEMEIER: Yes, we can. 17 (Recess taken from 10:42 a.m. to 18 10:43 a.m.) 19 BY MS. MENNEMEIER: 20 21 Okay. Are you aware of any changes Ο. that have been made to getordained.org to web 22 page -- excuse me. Strike that. 23

have been made to web pages on the

24

25

Are you aware of any changes that

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1 2111110

- 2 getordained.org website to add the words
- 3 "Universal Life Church"?
- 4 A. I mean, we've changed the website
- 5 probably thousands of times in the -- my
- 6 tenure, so I assume that may have been one of
- 7 those changes. I can't recall anything like
- 8 that specifically off the top of my head.
- 9 Q. Have any changes been made to web
- 10 pages on the getordained.org website to delete
- 11 the words "Universal Life Church"?
- 12 A. It would be the same answer. I
- mean, we've made thousands of changes. I
- 14 don't know what all those changes have
- 15 entailed over the years.
- Q. Do you remember specifically any
- 17 changes to web pages to delete the words
- 18 "Universal Life Church" on the getordained.org
- 19 website?
- 20 A. I don't remember anything like that
- 21 specifically, no.
- MS. MENNEMEIER: Do you mind if we
- 23 take a two-minute break?
- MR. MATESKY: Okay with me.
- 25 (Recess taken from 10:44 a.m. to

DALLAS GOSCHIE

- 2 10:47 a.m.)
- 3 MS. MENNEMEIER: Back on the
- 4 record.

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- 5 Q. Does ULCMS ever use the "get
- 6 ordained" brand alone?
- 7 MR. MATESKY: Objection; vague.
- 8 A. I believe so.
- 9 Q. Where does ULCMS use the "get
- 10 ordained" brand alone?
- 11 A. At the top of the web pages located
- 12 at the website at getordained.org. Again, in
- 13 conversations with our ministers or people who
- 14 may call in with questions, things like that.
- 15 Q. I want to clarify my question to
- 16 make sure that we're on the same page by what
- 17 you mean.
- We just reviewed some examples
- 19 where "get ordained" appears with the words
- 20 "Universal Life Church." Does ULCMS ever use
- 21 "get ordained" as a phrase by itself without
- 22 other words?
- A. I mean, it's a weird question for
- 24 me. Yes, that would be in the cases when, I
- 25 guess, people are talking to our ministers on

	DALLAS	GOSCHI

- 2 the phone.
- 3 But also I think that the inclusion
- 4 of the words "Universal Life Church" are an
- 5 artistic choice there. Like we have
- 6 established today, I didn't even know that
- 7 those words were there. They're very small.
- 8 So when I see that logo, I think of that as
- 9 just a representation of the "get ordained"
- 10 brand.
- 11 Q. And I appreciate that that's how
- 12 you understand it. I am just trying to
- 13 understand whether there are any instances in
- 14 documentary form, online, in writing in which
- 15 ULCMS uses "get ordained" without other words.
- MR. MATESKY: Objection as vague or
- 17 ambiguous in use "without other words."
- 18 A. If you're asking whether or not we
- 19 operate any sort of web page that just
- includes the words "get" and "ordained," I
- 21 don't think that I've seen anything like that.
- Q. Is the brand "get ordained" -- does
- 23 ULCMS ever use the brand "get ordained" alone
- 24 in writing?
- MR. MATESKY: Same objection.

- 2 A. It would be the same answer. Maybe
- 3 I just don't know what you mean by the word
- 4 "alone." But we -- as far as I know, we don't
- 5 operate a web page that just includes the
- 6 words "get ordained" on it and nothing else.
- 7 MS. MENNEMEIER: I think I have no
- 8 further questions.
- 9 MR. MATESKY: I will have some
- 10 questions on cross, but I'll need at
- 11 least probably 10 or 15 minutes. Want
- 12 to come back at 11:05?
- MS. MENNEMEIER: Sure.
- 14 (Recess taken from 10:51 a.m. to
- 15 11:12 a.m.)
- 16 EXAMINATION
- 17 BY MR. MATESKY:
- Q. All right. Mr. Goschie, I'm going
- 19 to ask you a few questions.
- 20 First, I will direct your attention
- 21 back to Exhibit B. Let me know when you've
- 22 got that in front of you.
- 23 A. Okay.
- Q. Do you believe this document
- 25 accurately reflects the content available at

DALLAS GOSCHIE

- 2 getordained.org?
- 3 A. No.

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- 4 Q. Do you believe there is content
- 5 available at getordained.org that is missing
- 6 from this document?
- 7 MS. MENNEMEIER: Objection; asked
- 8 and answered.
- 9 A. Yes.
- 10 Q. Do you believe there is content
- 11 reflected in this document that is not visible
- 12 at the website available at getordained.org?
- 13 A. Yes.
- 14 Q. Thank you.
- So Mr. Goschie, does ULCMS get
- 16 ordained?
- 17 A. No.
- 18 Q. Okay. Do the words "get ordained"
- 19 describe what ULCMS does?
- 20 A. No.
- Q. When someone becomes a minister
- 22 through the services provided by ULCMS, does
- 23 that minister become ordained?
- A. Can you ask that one more time.
- 25 O. When someone becomes a minister

- 2 through the services provided by ULCMS, is it
- 3 that minister who becomes ordained?
- 4 A. Yes.
- 5 Q. Have you ever heard anyone refer to
- 6 the class of services that ULCMS provides as
- 7 "get ordained services"?
- 8 A. No.
- 9 Q. What terms have you heard commonly
- 10 used to refer to the class of services that
- 11 ULCMS provides?
- 12 A. "Church services," "religious
- 13 services, "things like that.
- Q. Do you know how the Wayback Machine
- 15 captures web pages?
- 16 A. No.
- Q. Do you know how frequently the
- 18 Wayback Machine captures web pages?
- 19 A. No.
- Q. Do you know of any studies testing
- 21 the accuracy of Wayback Machine captures?
- 22 A. No.
- MR. MATESKY: That's all I've got.
- 24 Thank you.
- MS. MENNEMEIER: Okay. I'm going

- 2 to have a few questions on redirect, but
- 3 if you could give me a few minutes to
- 4 organize those, that would be great.
- 5 Thank you.
- 6 MR. MATESKY: Okay.
- 7 (Recess taken from 11:15 a.m. to
- 8 11:21 a.m.)
- 9 EXAMINATION
- 10 BY MS. MENNEMEIER:
- 11 Q. Mr. Goschie, did you discuss your
- 12 testimony with counsel during any of our
- 13 breaks today?
- MR. MATESKY: Objection. That's
- 15 attorney-client privilege.
- Q. Mr. Goschie, I'm not asking the
- 17 content of what you discussed except to the
- 18 extent you may have discussed your testimony.
- 19 I simply wondering, yes or no, whether you
- 20 discussed the content -- whether you discussed
- 21 your testimony with counsel during any of our
- 22 breaks.
- MR. MATESKY: Yeah, that's asking
- for the content of our correspondence.
- I'm going to instruct the witness not to

DALLAS GOSCHIE 1 answer that question. MS. MENNEMEIER: Mike, I'm entitled 3 to ask this question because it's 4 improper for counsel to discuss 6 testimony with the witness during a witness's examination, and I'm entitled to test whether that may have, in fact, 8 If it did -occurred. 9 MR. MATESKY: I --10 11 MS. MENNEMEIER: -- know so that I can seek appropriate relief from the 12 13 board. 14 MR. MATESKY: I'm going to leave my 15 instruction to the witness not to answer that question. If you want to take a 16 17 break for a moment and come back, we can do that. But I'm -- for now I'm 18 19 instructing him not to answer that 20 question because you're asking about the 21 content of his correspondence with 22 counsel. 23 BY MS. MENNEMETER: 24

Mr. Goschie, did you speak with Ο. your counsel during any of our breaks today? 25

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- 2 MR. MATESKY: You may answer.
- 3 A. Yes.
- 4 Q. Did you speak with counsel during
- 5 all of our breaks today?
- 6 A. No, I don't think so.
- 7 Q. During which breaks did you speak
- 8 with counsel?
- 9 A. I didn't mark down the times we
- 10 took breaks and what I did during those.
- 11 Q. Did you speak with counsel prior to
- 12 Mr. -- during the break immediately prior to
- 13 when Mr. Matesky asked you questions just now?
- 14 A. Yes.
- Q. Did you discuss your testimony with
- 16 counsel during that break?
- 17 MR. MATESKY: I'm going to -- I
- 18 believe that calls for the content of
- our correspondence. I'm going to
- instruct the witness not to answer.
- MS. MENNEMEIER: Okay. I hear your
- refusal -- you're -- I hear that you're
- refusing to allow the witness to answer.
- I am going to insert an objection
- that, to the extent that any testimony

- was discussed during that break, that
- 3 that discussion was improper, and so I'm
- 4 going to seek appropriate relief from
- 5 the board up to and including striking
- 6 Mr. Goschie's testimony following that
- 7 break. Okay.
- 8 BY MS. MENNEMEIER:
- 9 Q. Mr. Goschie, if I can have you open
- 10 the document that's been pre-labeled
- 11 Exhibit B.
- 12 A. Sorry. Which letter?
- 13 O. B.
- Do you have that open?
- 15 A. No. I think that program froze.
- 16 One moment.
- 17 Okay.
- 18 Q. Was it your testimony earlier that
- 19 content available on the getordained.org web
- 20 page is missing from this exhibit?
- 21 A. I believe so.
- Q. What content is -- from the
- 23 getordained.org web page is missing from this
- 24 exhibit?
- 25 A. I believe that there's a large

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- 2 header and a row of menu options that is not
- 3 apparent here. I believe -- and I could be
- 4 wrong, but I believe there are links to our
- 5 social media on that page that I'm also not
- 6 seeing here. There may be a few other
- 7 elements that are missing that I just can't
- 8 remember right now.
- 9 Q. Besides the missing menu options
- 10 and links to social media, is there textual
- 11 content on the getordained.org web page that
- is missing from this document?
- 13 A. I'm not certain if any text appears
- in the header image above that row, menu
- 15 options. I believe there's a logo somewhere
- 16 up there as well, at the very least, that
- 17 includes words.
- 18 Q. Besides that, are you aware of any
- 19 textual content that is missing from this
- 20 document that would appear on the -- that does
- 21 appear on the getordained.org web page?
- 22 A. Sorry. I'm losing track.
- Besides what? What are we at now?
- Q. Besides the logo and any text that
- 25 would appear in that top bar besides the menu

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- 2 options and besides the links to social media.
- A. No, nothing is immediately coming
- 4 to mind. Again, there could be other things.
- 5 Q. Do you have any reason to doubt the
- 6 accuracy of the archives available through the
- 7 Wayback Machine?
- 8 A. I don't know how it works, so I
- 9 don't think have the authority to trust or
- 10 disbelieve them necessarily.
- 11 Q. Have you ever seen an archived web
- 12 page on the Wayback Machine that you know to
- be an inaccurate archive copy of a web page?
- 14 A. I just can't remember every single
- 15 time that I used it over the years.
- Q. Do you recall any instance in which
- 17 you saw something appear on the Wayback
- 18 Machine that you knew to be inaccurate?
- 19 A. I mean, nothing specific is coming
- 20 to mind, but I can't really recall any
- 21 specific instance of ever using it.
- 22 MS. MENNEMEIER: I have no further
- 23 questions.
- MR. MATESKY: Nothing from us.
- I guess we've got some time --

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22		the Wayback Machine, July 23,	
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3		getordained.org, archived by		
4		the Wayback Machine,		
5		December 27, 2014, ULCM000197		
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8		getordained.org, archived by		
9		the Wayback Machine, July 16,		
10		2016, ULCM000200		
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12				
13	* * *			
14				
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16				
17		Page Line		
18	Q. Mr. Goschie, I'm not asking the65 16			
19	content of what you discussed except			
20	to the extent you may have discussed			
21	your testimony. I simply wondering,			
22	yes or no, whether you discussed the			
23	content whether you discussed your			
24	testimony with counsel during any of			
25	our breaks.			
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2	Q. Did you discuss your testimony67 15	
3	with counsel during that break?	
4		
5		
6	* * *	
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2	ERRATA SHEET FOR THE TRANSCRIPT OF:	
3	Case Name: AMM v ULCMS	
4	Dep. Date: September 9, 2020	
5	Deponent: DALLAS GOSCHIE	
6	CORRECTIONS:	
7	Pg. Ln. Now Reads Should Read Reason	
8	SEE ATTACHED FORM	
9		
10		
11		
12		
13		
14		
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16		
17		
18		
19		
20	Signature of Deponent	
21	SUBSCRIBED AND SWORN BEFORE ME	
22	THIS 2ND DAY OF November, 2020. NOTARY PUBLIC #71555	
23	COMMISSION EXPIRES MAY 19, 2023	
24/	- Jahren Ol	
2/5	(Notary Public) MY COMMISSION EXPIRES: 05-19-2023	

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11:14	"I specified in	"I specified in a	Transcriptio
	declaration"	declaration"	n error
13:12-13	"about this?? I don't	"about this - I don't	Edited
	remember if it was last year,	remember if it was last year,	punctuation
	maybe the year before?? it's	maybe the year before it's	for clarity,
	very contextual. So"	very contextual. So if you"	transcriptio
	Tory contentual so	very contextual, so it you	n error
15:10	"of service level	"of surface level"	Transcriptio
15.10	or service level	or surface rever	n error
17:4	"how I used it."	"how I use it."	Transcription
17.4	now I used it.	now i use it.	_
10.2	"Getordained?"	"Cat Oudaina do"	n error
18:3	Getordained?	"Get Ordained?"	Transcriptio
			n error
24:11	"like, I don't memorize"	"like I don't memorize"	Edited
			punctuation
			for clarity
30:23-24	"grabs that I'm imagining	"grabs - that I'm imagining	Edited
	you took because there's a	you took because there's a	punctuation
	little K in the corner of a	little "K" in the corner - of a	for clarity
	page"	page"	
31:2	"like?? I don't know what	"like – I don't know what	Edited
	today is?? last"	today is – last"	punctuation
			for clarity
57:10	"aware, only legally"	"aware, our only legally"	Transcription
	,,,	, , , , , , , , , , , , , , , , , , , ,	n error
	I .		

	2011 9:25 40:6 41:2,	87430729 8:7	apparent 44:17 69:3	f <u></u>
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Ordination Credentials Package



Premium Wedding Package



Certified Letter of Good Standing



Classic Wedding Package

Become a Minister



The Universal Life Church Monastery, also known as the "ULC", has been serving our online church community for nearly 40 years.

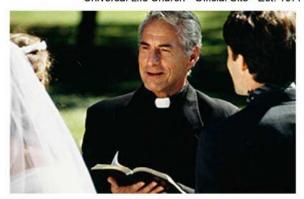
Our fundamental tasks are to promote freedom of religion and to "do that which is right" - core tenets that underscore everything we do. The ULC appeals to a worldwide audience through our online church services and our

overarching belief that "we are all children of the same universe."

Over 20 million ministers worldwide have become ordained with the Universal Life Church. The ULC is a non-denominational organization open to people of all faiths, offering everyone the religious freedom to become an ordained minister and practice their beliefs. Those who get ordained with the Universal Life Church are empowered to take control of their own spiritual lives and do good in their own worlds. As a minister, you have the authority to perform weddings, funerals, baptisms, or even start your own ministry. Join the active ULC community by completing your free online ordination today.



AMM Exhibit A AMM v. ULCMS



Wedding Ceremony Script

This completely-customizable tool can help you to build and download a one-of-a-kind wedding ceremony script for nearly any occasion.



ULC Ministers Network

Chat with your universal brothers and sisters in our dedicated social network – a private community for Universal Life Church ministers.



ULC Blog, From the Pulpit

Our millions of ministers come from all walks of life and all corners of the globe. Come read and exchange thoughts and ideas on our blog.

Are you feeling lost? Searching for meaning? Need a change? Online ordination through the Universal Life Church opens the doors to a fresh start in your life. A ULC ordination is completely legal throughout most of the U.S. and, increasingly, internationally. The Universal Life Church offers a number of helpful tools that can help you expand your ministry and your mind. As you explore this website you'll find a great deal of content designed to train you as a minister, aid you in performing better ceremonies, and help you to navigate and understand your world.

Additionally, the ULC's Minister Supply store is stocked with everything you'll need to perform a wedding or other religious service for friends or family members, build your own ministry, verify your

https://www.themonastery.org 2/4

ordination, or educate yourself. Anyone can become a minister of the ULC, and your ordination is valid for life. Get ordained online and become a minister today, we'd love to welcome you into our Universal family.

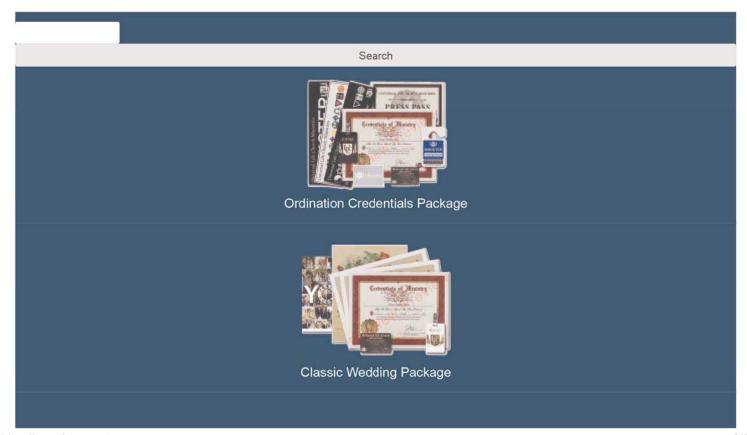


Please become ordained or enter your information below to begin receiving our acclaimed weekly newsletter *The Visionary*. Each week, we carefully write and curate the best stories related to all things religion and spirituality, their intersection with human life, and beyond! *The Visionary* is completely free and a must-read to keep you informed throughout the week – **subscribe now!**

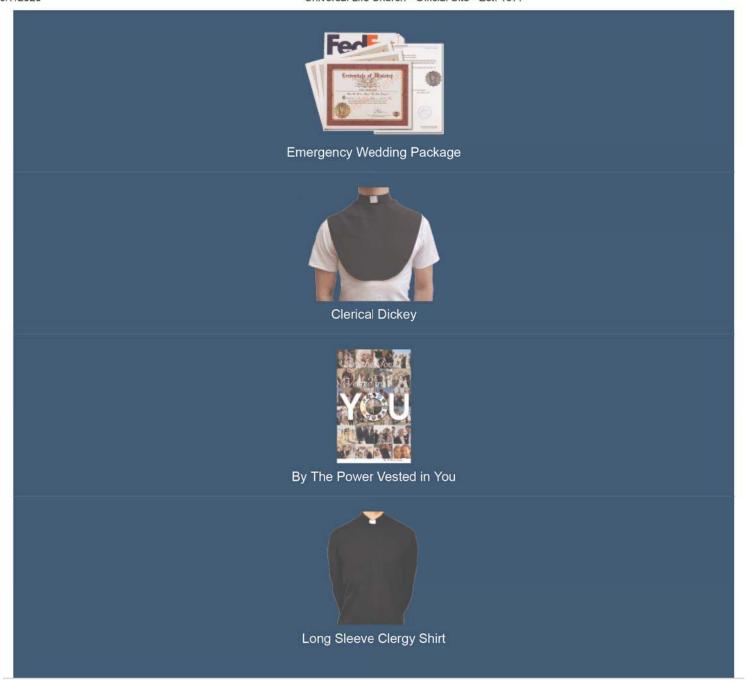
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As far as possible without surrender be on good terms with all persons.

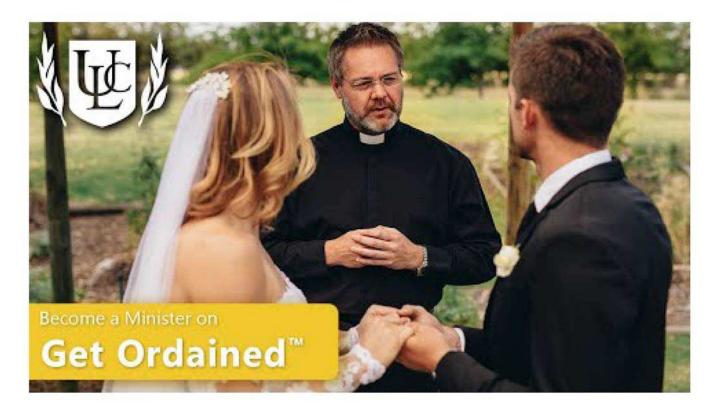


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BECOME A MINISTER (HTTPS://GETORDAINED.ORG/FREE-ORDINATION)

- Legally Officiate Weddings
- Ordination Takes Five Minutes
- Get Started Without Experience
- · We Accept All Faiths
- · Create Lasting Memories
- Online Wedding Training

Begin Free Online Ordination (https://getordained.org/free-ordination)

Looking to become a minister? The task can seem daunting. You might not have the time or money to attend seminary or theological school — they can cost more than \$50,000! Or maybe you've simply put the idea on the "back burner"... Fortunately, the Universal Life Church makes the whole process fast and free.

The ULC is a non-denominational, nondiscriminatory organization that allows anyone to utilize the Get Ordained online tools to receive their certification, bypassing the traditional "brick and mortar" religious education establishments. Anybody can become a minister, from your next-door neighbor to celebrities like Conan O'Brien and Bryan Cranston (http://www.universallifechurchministers.org)!

How to Get Ordained and Perform a Wedding

 Fill out our quick and easy <u>ordination application (https://getordained.org/free-ordination)</u> online to become an ordained minister.

> AMM Exhibit B AMM v. ULCMS

- 2. Research your <u>state laws on officiating marriage ceremonies (https://getordained.org/state-marriage-laws)</u> in America and beyond.
- 3. Obtain any <u>wedding supplies (https://getordained.org/ministry-supplies)</u> or necessary state requirements such as <u>certificates (https://getordained.org/ministry-supplies/classic-wedding-kit)</u>, <u>letter of good standing (https://getordained.org/ministry-supplies/letter-good-standing)</u>, etc.
- 4. Read <u>By The Power Vested in You (https://getordained.org/ministry-supplies/by-the-power-vested-in-you)</u> for a step-by-step how-to guide on becoming a wedding officiant to perform weddings.
- 5. Create and print your <u>free wedding ceremony script (https://getordained.org/wedding-script-generator)</u> that you can use to perform a legal religious marriage ceremony.

Begin Free Online Ordination (https://getordained.org/free-ordination)

As a minister, you'll be able to officiate weddings, perform baptisms, solemnize funerals, and even lead your own congregation. Read some of the articles on the above menu to learn more about your rights and responsibilities.

Online Ordination



The Get Ordained Service is fast, easy, and hassle free! Click here to begin the process of becoming a minister today!

(https://getordained.org/free-ordination)

Ministry Supplies



We provide all the necessary products you need to perform a ceremony, or start your own ministry business. Click to learn more.

(https://getordained.org/ministry-supplies)

Wedding Training





Not sure how to perform a ceremony? We can help, click here to find all our different wedding resources and wedding guides.

(https://getordained.org/training/wedding/how-to-perform-weddings)

Find a Minister

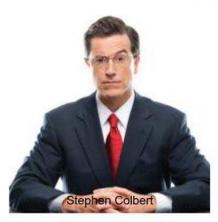


Looking for a minister? Browse our ministers to find ministers in your local area for your next wedding. Start your search now.

(https://getordained.org/find-a-minister)

Some of Our Famous Ministers



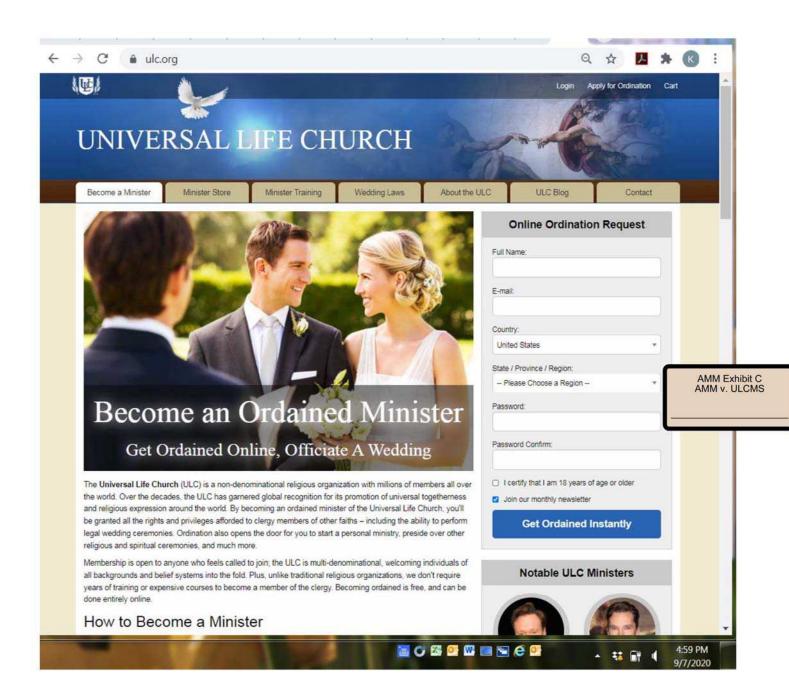




















Membership is open to anyone who feels called to join; the ULC is multi-denominational, welcoming individuals of all backgrounds and belief systems into the fold. Plus, unlike traditional religious organizations, we don't require years of training or expensive courses to become a member of the clergy. Becoming ordained is free, and can be done entirely online.

How to Become a Minister

The Universal Life Church believes that all people are naturally endowed with the right to control their own spiritual life, and thus that all those who feel so-called should have access to ordination.

Ordination at the Universal Life Church is completely legal, is cost-free, and isn't complicated. An ancient Chinese proverb instructs us that the journey of a thousand miles begins with a single step. Within you lies the capacity to make the universe a better place, and your ordination may well unlock that potential. You can take your first step today by completing and submitting your online ordination application now.

Become an Ordained Minister

Minister Training

We're proud to offer support to a fast-growing community of ministers in all of their endeavors. To that end, we've created a collection of minister training materials here on our site. These helpful resources go in-depth to provide advice and instruction on a whole host of ministerial duties. We also operate a blog to keep our ministers up-todate on relevant current events and offer interesting topics of discussion.

While ULC ordinations can serve a variety of purposes, many ministers choose to use their ordination perform wedding ceremonies. Sound intimidating? Not to fear, solemnizing a marriage is not as complicated as it might sound. We've created a simple guide, found below, that explains the process.

Steps to Performing a Wedding

Contact Marriage License Authority

Once you are ordained, but before performing the ceremony, you may need to obtain documentation proving you are a licensed marriage officiant. These policies vary by state, and sometimes even from county to county. For more information about the rules in your area, visit our State Marriage Laws page.

Most places will request some basic documentation such as an ordination credential, a letter of good standing, or signed statements of ministry. You can find all of these items, along with a host of other minister supplies, in the Minister Store section of this







Notable ULC Ministers Conan O'Brien Lady Gaga The Rock Richard Branson

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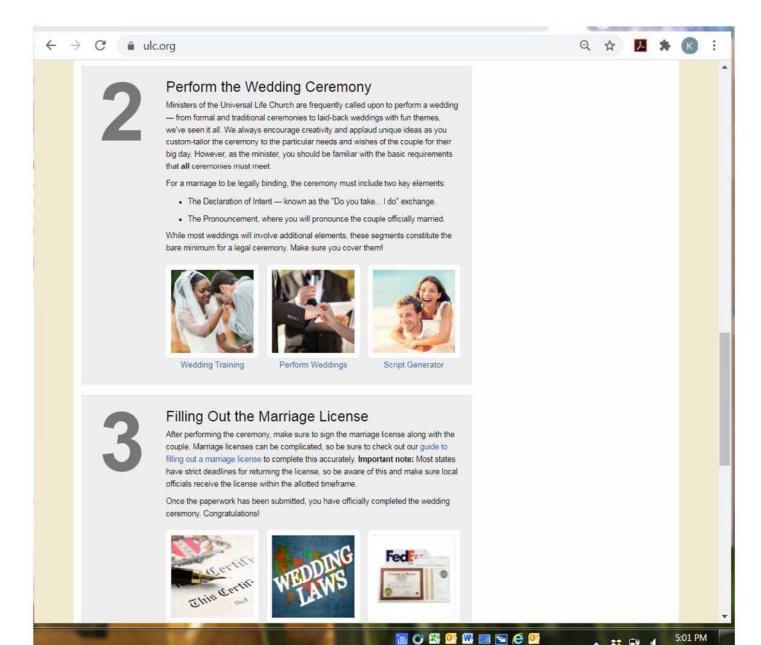








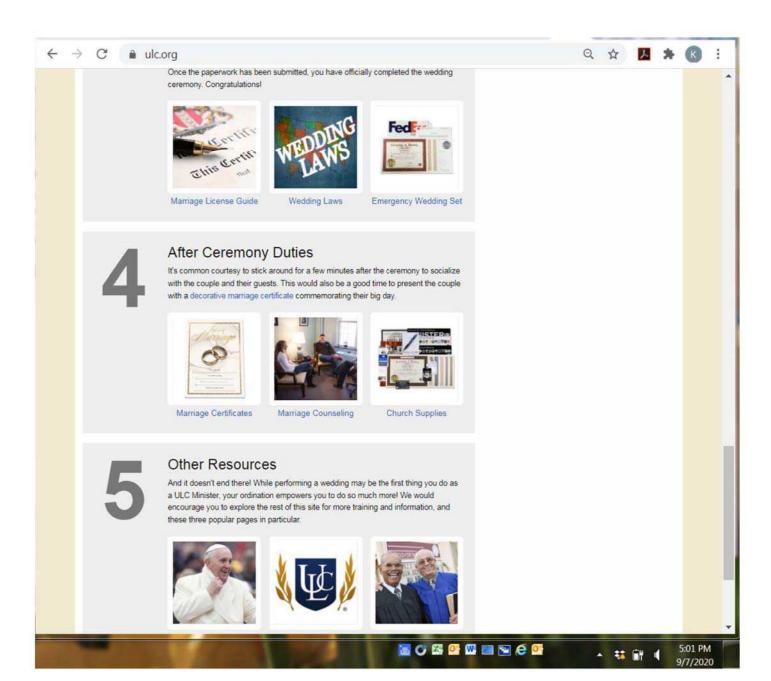
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+ Ordinations

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+ Wedding Training + Chapel

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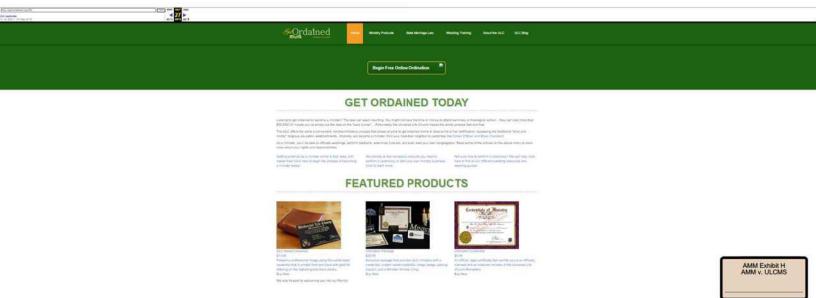
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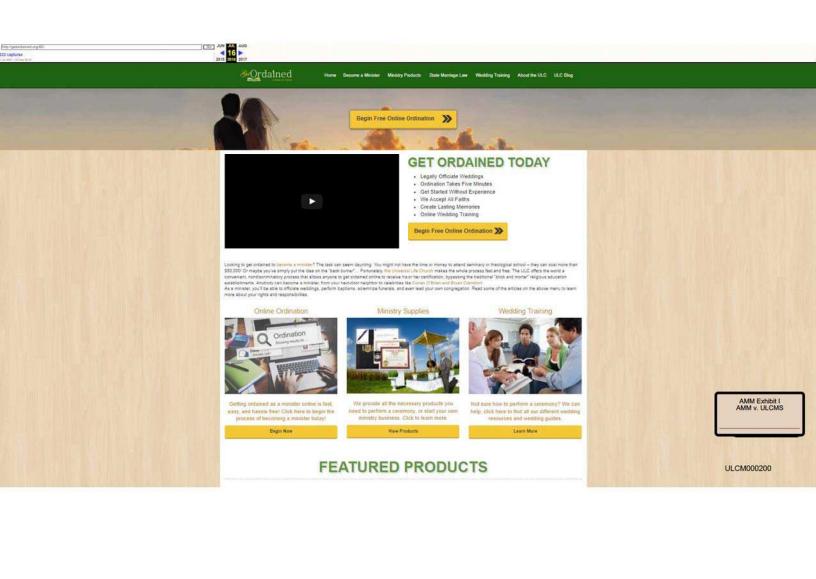
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OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 87430729 Filing Date: 04/28/2017

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered		
TEAS Plus	YES		
MARK INFORMATION			
*MARK GET ORDAINED			
*STANDARD CHARACTERS	YES		
USPTO-GENERATED IMAGE	YES		
LITERAL ELEMENT	GET ORDAINED		
*MARK STATEMENT	The mark consists of standard characters, without claim style, size, or color.	to any particular font	
REGISTER	Principal		
APPLICANT INFORMATION			
*OWNER OF MARK	OWNER OF MARK Universal Life Church Monastery Storehouse, Inc.		
*STREET	1425 Broadway #67		
*CITY	Seattle	AMM Exhibit	
*STATE (Required for U.S. applicants)	Washington	AMM Exhibit AMM v. ULCI	
*COUNTRY	United States		
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	98122		
LEGAL ENTITY INFORMATION			
*TYPE	CORPORATION		
* STATE/COUNTRY OF INCORPORATION	Washington		
GOODS AND/OR SERVICES AND BASIS IN	NFORMATION		
*INTERNATIONAL CLASS	035		
*IDENTIFICATION On-line retail store services featuring clothing in the nature of shirts, hats stoles; stationery; business cards; bumper stickers; license plate holder badges; pens; pins; musical sound recordings; bookmarks; bread; aromatic oil; portfolios; and publications in the nature of books, handouts, workbooks, manuals, brochures, and newsletters in the fields of religion, spirituality, marriage, law, and management		cense plate holders; narks; bread; re of books, hand- rs in the fields of	

*FILING BASIS	SECTION 1(a)	
FIRST USE ANYWHERE DATE	At least as early as 11/17/2016	
FIRST USE IN COMMERCE DATE	At least as early as 11/17/2016	
SPECIMEN FILE NAME(S)		
ORIGINAL PDF FILE	SPE0-731409484-20170427185650169915 . Class 35 Specimens.pdf	
CONVERTED PDF FILE(S) (2 pages)	\\TICRS\EXPORT17\IMAGEOUT17\874\307\87430729\xml1\FTK0003.JPG	
	\\TICRS\EXPORT17\IMAGEOUT17\874\307\87430729\xml1\FTK0004.JPG	
SPECIMEN DESCRIPTION Screen capture showing use of applied-for mark in connection retail store services		
*INTERNATIONAL CLASS	045	
*IDENTIFICATION	Conducting religious ceremonies; Ecclesiastical services, namely, ordaining ministers to perform religious ceremonies; Providing a website featuring information about religious belief systems	
*FILING BASIS	SECTION 1(a)	
FIRST USE ANYWHERE DATE	At least as early as 07/10/2011	
FIRST USE IN COMMERCE DATE	At least as early as 07/10/2011	
SPECIMEN FILE NAME(S)		
ORIGINAL PDF FILE	SPE0-731409484-20170427185650169915 . Class 45 Specimens.pdf	
CONVERTED PDF FILE(S) (3 pages)	\\TICRS\EXPORT17\IMAGEOUT17\874\307\87430729\xml1\FTK0005.JPG	
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	\\TICRS\EXPORT17\IMAGEOUT17\874\307\87430729\xm11\FTK0007.JPG	
SPECIMEN DESCRIPTION Image showing ordination certificate given to recipient of ordination bearing applied-for mark		
ADDITIONAL STATEMENTS INFOR	MATION	
*TRANSLATION (if applicable)		
*TRANSLITERATION (if applicable)		
*CLAIMED PRIOR REGISTRATION (if applicable)		
*CONSENT (NAME/LIKENESS) (if applicable)		
*CONCURRENT USE CLAIM (if applicable)		
ATTORNEY INFORMATION		
NAME	Michael P. Matesky, II	
ATTORNEY DOCKET NUMBER	ULCM 00246	
FIRM NAME	Matesky Law PLLC	
STREET	1001 4th Ave., Suite 3200	
СІТУ	Seattle	
TATE Washington		

COUNTRY	United States
ZIP/POSTAL CODE	98154
PHONE	206.701.0331
FAX	206.701.0332
EMAIL ADDRESS	trademarks@mateskylaw.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
*NAME	Michael P. Matesky, II
FIRM NAME	Matesky Law PLLC
*STREET	1001 4th Ave., Suite 3200
*CITY	Seattle
*STATE (Required for U.S. addresses)	Washington
*COUNTRY	United States
*ZIP/POSTAL CODE	98154
PHONE	206.701.0331
FAX	206.701.0332
*EMAIL ADDRESS	trademarks@mateskylaw.com; mike@mateskylaw.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	2
FEE PER CLASS	225
*TOTAL FEE PAID	450
SIGNATURE INFORMATION	
* SIGNATURE	/George Freeman/
* SIGNATORY'S NAME	George Freeman
* SIGNATORY'S POSITION	President
SIGNATORY'S PHONE NUMBER	2062851086
* DATE SIGNED	04/28/2017

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OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 87430729 Filing Date: 04/28/2017

To the Commissioner for Trademarks:

MARK: GET ORDAINED (Standard Characters, see mark)

The mark in your application is GET ORDAINED.

The applicant, Universal Life Church Monastery Storehouse, Inc., a corporation of Washington, having an address of 1425 Broadway #67
Seattle, Washington 98122
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 035: On-line retail store services featuring clothing in the nature of shirts, hats, stoles; stationery; business cards; bumper stickers; license plate holders; badges; pens; pins; musical sound recordings; bookmarks; bread; aromatic oil; portfolios; and publications in the nature of books, hand-outs, workbooks, manuals, brochures, and newsletters in the fields of religion, spirituality, marriage, law, and management

Use in Commerce: The applicant is using the mark in commerce on or in connection with the identified goods/services. The applicant attaches, or will later submit, one specimen as a JPG/PDF image file showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, regardless of whether the mark itself is in the standard character format or is a stylized or design mark. The specimen image file may be in color, and the image must be in color if color is being claimed as a feature of the mark.

In International Class 035, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 11/17/2016, and first used in commerce at least as early as 11/17/2016, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) Screen capture showing use of applied-for mark in connection with online retail store services.

Original PDF file:

SPE0-731409484-20170427185650169915 . Class 35 Specimens.pdf

Converted PDF file(s) (2 pages)

Specimen File1
Specimen File2

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 045: Conducting religious ceremonies; Ecclesiastical services, namely, ordaining ministers to perform religious ceremonies; Providing a website featuring information about religious belief systems

Use in Commerce: The applicant is using the mark in commerce on or in connection with the identified goods/services. The applicant attaches, or will later submit, one specimen as a JPG/PDF image file showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, regardless of whether the mark itself is in the standard character format or is a stylized or design mark. The specimen image file may be in color, and the image must be in color if color is being claimed as a feature of the mark.

In International Class 045, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 07/10/2011, and first used in commerce at least as early as 07/10/2011, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) Image showing ordination certificate given to recipient of ordination services bearing applied-for mark.

Original PDF file:

SPE0-731409484-20170427185650169915 . Class 45 Specimens.pdf

Converted PDF file(s) (3 pages)

Specimen File1

Specimen File2

Specimen File3

The applicant's current Attorney Information:

Michael P. Matesky, II of Matesky Law PLLC 1001 4th Ave., Suite 3200

Seattle, Washington 98154

United States

206.701.0331(phone)

206.701.0332(fax)

trademarks@mateskylaw.com (authorized)

The attorney docket/reference number is ULCM 00246.

The applicant's current Correspondence Information:

Michael P. Matesky, II

Matesky Law PLLC

1001 4th Ave., Suite 3200

Seattle, Washington 98154

206.701.0331(phone)

206.701.0332(fax)

trademarks@mateskylaw.com;mike@mateskylaw.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or the applicant's attorney, or the applicant's domestic representative at the e-mail address provided in this application. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in the loss of TEAS Plus status and a requirement to submit an additional processing fee of \$125 per international class of goods/services.

A fee payment in the amount of \$450 has been submitted with the application, representing payment for 2 class(es).

Declaration

☑ If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- · The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- The facts set forth in the application are true.

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
- The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the
 application; and
- The facts set forth in the application are true.

V	To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the
	mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the
	goods/services of such other persons, to cause confusion or mistake, or to deceive.

ω'	To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the
	allegations and other factual contentions made above have evidentiary support.

¥	The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. §
	1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration
	resulting therefrom, declares that all statements made of his/her own knowledge are true and that all statements made on information
	and belief are believed to be true

Declaration Signature

Signature: /George Freeman/ Date: 04/28/2017

Signatory's Name: George Freeman Signatory's Position: President

Signatory's Phone Number: 2062851086 Payment Sale Number: 87430729 Payment Accounting Date: 05/01/2017

Serial Number: 87430729

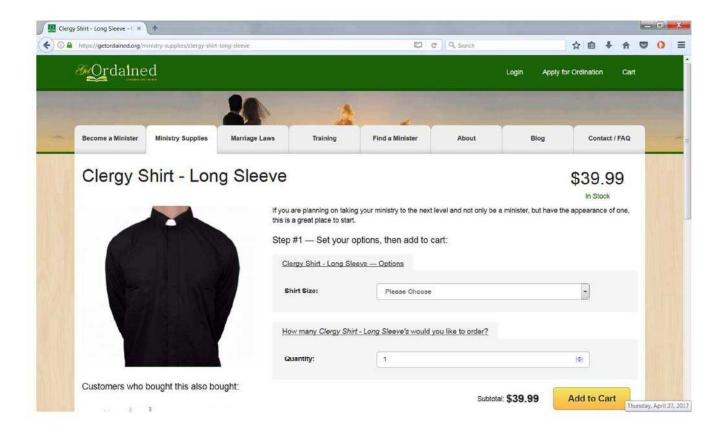
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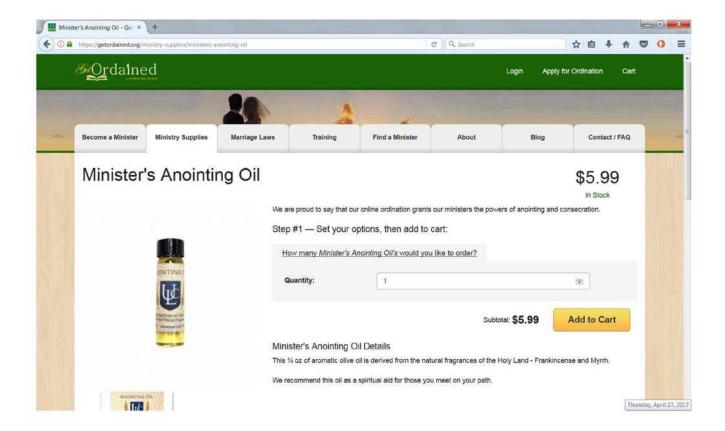
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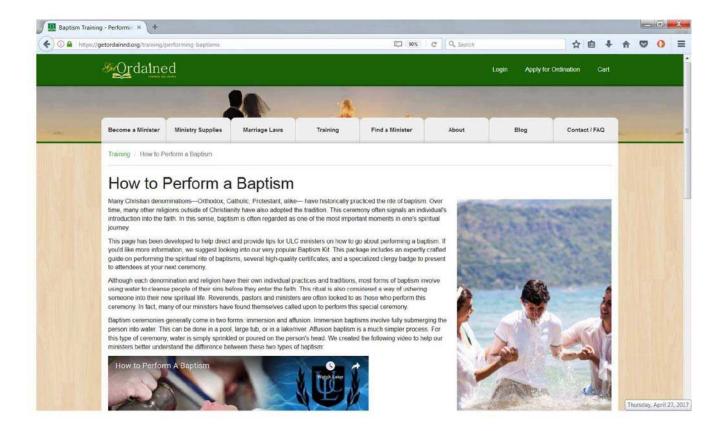
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GET ORDAINED











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5	Opposer,)
)
6	v.) Opposition No. 91237315
)
7	UNIVERSAL LIFE CHURCH)
	MONASTERY STOREHOUSE, INC.)
8)
	Applicant.)
9	
10	COMBINED PERSONAL AND 30(B)(6) DEPOSITION
11	UPON ORAL EXAMINATION
12	OF
13	DALLAS GOSCHIE
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16	Taken at 1111 Third Avenue
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	Seattle, Washington
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24	REPORTED BY: KATHLEEN HAMILTON, RPR, CRR, CCR 1917
25	Job no. 154149

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- 1 DALLAS GOSCHIE
- ² attorneys' eyes only.
- MS. MENNEMEIER: No problem.
- 4 Could you please mark this, are we up to
- 5 Exhibit 10?
- 6 (Exhibit 10 marked.)
- 7 BY MS. MENNEMEIER:
- 8 Q. You've just been handed a copy of what's been
- 9 marked as Exhibit 10. This is AMM 702.
- Do you recognize this?
- 11 A. Yes.
- 12 Q. What is this document?
- 13 A. It looks like an old version of the Monastery
- website.
- Q. Can you see the label on this page that says
- 16 Internet Archive Wayback Machine in the top left-hand
- 17 corner?
- ¹⁸ A. Yes.
- Q. Are you familiar with the Wayback Machine?
- 20 A. I am.
- Q. What is the Wayback Machine?
- A. It's, it's like a, I believe Congress used to be
- involved somehow, but I don't think they are anymore,
- but it's an archive of, I think the goal is eventually
- every web page on the Internet, but it crawls through

- 1 DALLAS GOSCHIE
- 2 certain sites at certain times and does screenshots of
- them to try to preserve the entire Internet, which is
- 4 always shifting.
- ⁵ Q. Can you tell what date this screenshot of this
- 6 page was taken?
- 7 A. Yes.
- 8 O. What date was the screenshot taken?
- 9 A. Or I'm sorry. No, I don't know what date you
- took -- well, okay.
- 11 Q. Let me rephrase. Can you tell what date the
- Wayback Machine captured a screenshot of this page?
- 13 A. This looks like an archive of the page on
- 14 November 9th, 2006.
- Q. And what's the URL of this page, of the page
- that the Wayback Machine archived?
- 17 A. It looks like themonastery.org, just the home
- 18 page.
- 19 Q. In the first paragraph of the text on this page,
- that first sentence, could you please read that first
- sentence.
- 22 A. The -- excuse me. The Universal Life Church is
- the only denomination in the world that opens its doors
- to all and welcomes all who ask to get ordained and
- grants it without question.

1	DALLAS GOSCHIE
2	CERTIFICATE
3	
4	STATE OF WASHINGTON
5	COUNTY OF KING
6	
7	I, Kathleen Hamilton, a Certified Shorthand
8	Reporter and Notary Public in and for the State of
9	Washington, do hereby certify that the foregoing
10	transcript of the deposition of DALLAS GOSCHIE, having
11	been duly sworn, on JANUARY 18, 2019, is true and
12	accurate to the best of my knowledge, skill and ability.
13	IN WITNESS WHEREOF, I have hereunto set my hand
14	and seal this 31st day of JANUARY, 2019.
15	
16	
17	
18	KATHLEEN HAMILTON, RPR, CRR, CCR #1917
19	
20	
21	
22	
23	
24	
25	

1	ERRATA SHEET Universal Life Church Monastery Storehouse, Inc.
2	Case Name: v. American Marriage Ministries, No. 91237315
3	Deposition Date: January 18, 2019
4	Deponent: Dallas Goschie
5	Pg. No. Now Reads Should Read Reason
6	See attached
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	Signature of Deponent
22	SUBSCRIBED AND SWORN BEFORE ME
23	THIS 4th DAY OF March , 2019. State of Washington JS JOHNSTON
24	MY COMMISSION EXPIRES 10/06/2021
25	(Notary Public) MY COMMISSION EXPIRES: 10 4 2021

Page:Line(s)	Now Reads	Should Read	Reason
5:13	you've answers	you answer	Incorrect
			transcription
10:15-16	to like marketing.	to, like, marketing	Clarification
16:24-25	of like minister supplies,	of, like, minister supplies	Clarification
21:5-6	Universal Life Church, slash,	Universal Life Church/ULC	Clarification
	ULC Monastery?	Monastery?	
21:14	Universal Life Church, slash,	Universal Life Church/ULC	Clarification
	ULC Monastery?	Monastery?	
22:17	being like appointed	being, like, appointed	Clarification
23:6	spiritual, slash, faith, slash,	spiritual/faith/religious	Clarification
	religious	-1	
23:15-16	about like legal	about, like, legal	Clarification
27:16	roles	rolls	Incorrect
			transcription
28:8	require, perform marriage	require performing marriage	Incorrect
20.0	ceremonies.	ceremonies?	transcription
38:6-11	I mean he'll provide like,	I meanhe'll provide, like,	Clarification
30.0 11	because he's a spiritual leader	because he's a spiritual leader	Ciarmeation
	of the Universal Life Church,	of the Universal Life Church,	
	he'll provide kind of general	he'll provide kind of general	
	language and ideas that could	language and ideas that could	
	be incorporated in those ads,	be incorporated in those ads,	
	but he's not making day-to- day decisions on any like	but he's not making day-to-day	
		decisions on any, like, specific	
39:14-15	specific language or anything.	language or anything.	Imagenesat
39:14-13	engine, listings	engine listings	Incorrect
12.15	1	1-1-	transcription
43:15	website	websites	Incorrect
11.00.00	1 21 22 1	1 11 11 11 11 11 11	transcription
44:22-23	makes with certainty lists	ranks, with certainty, listings	Incorrect
15.10			transcription
45:18	worked	work	Incorrect
1212727 27	***		transcription
50:2-3	many like use	many, like, uses	Incorrect
			transcription
53:2	things would	things that would	Incorrect
Watter when it Materials are			transcription
53:18	ministries Ministries		Clarification
55:18	mechanically	mechanically:	Clarification
64:9	instruct to answer	Instructing	Incorrect
			transcription
78:10	opposition, our	opposition to our	Incorrect
			transcription

Page:Line(s)	Now Reads	Should Read	Reason
90:6-8	it's like Catholic doctrine, that	it's, like, Catholic doctrine that	Clarification
	to be ordained in certain	to be ordained in certain	
	positions, like an actual	positions, like, an actual	
	perceived involvement of like	perceived involvement of, like,	
	a deity	a deity	
91:14	and like a	and, like, a	Clarification
106:8-9	at Monastery site	at the Monastery site	Incorrect transcription
111:19	monastery.org	themonastery.org	Incorrect transcription
112:22	spiritual, slash, faith, slash, religious life	spiritual/faith/religious life	Clarification
116:21-22	HTTPS, colon, forward slash, forward slash, www.themonastery.org, forward slash, ordination.	HTTPS://www.themonastery.org/ordin ation.	Clarification
121:20	what I can see	from what I can see	Incorrect
			transcription